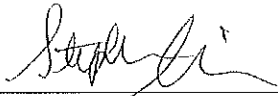


Approved: 
STEPHANIE SIMON
Assistant United States Attorney

Before: THE HONORABLE JUDITH C. MCCARTHY
United States Magistrate Judge
Southern District of New York

- - - - - x *22mj5356*
UNITED STATES OF AMERICA : COMPLAINT

- v. - : Violations of
ALI SABREE, : 18 U.S.C. §§ 922(g)(1)
: and 2
Defendant. : COUNTY OF OFFENSE:
WESTCHESTER
- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss.:

KARMA SMITH, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(Felon in Possession of a Firearm)

1. On or about June 25, 2022, in the Southern District of New York and elsewhere, ALI SABREE, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess a firearm, to wit, a loaded Rossi .357 revolver, S/N F090464, which previously had been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Sections 922(g)(1) and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Special Agent with the FBI, and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents, as well as my examination of reports and

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records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my review of reports, records, photographs, and body camera footage received from the Yonkers Police Department ("YPD"), my conversations with other law enforcement officers, and my participation in this investigation, I have learned, among other things, the following:

a. On or about June 25, 2022, at approximately 8:53 a.m., YPD received a report that a woman ("Victim-1") had had a gun pulled on her outside a home in Yonkers, New York ("Residence-1"), by ALI SABREE, the defendant. YPD responded to the scene and placed SABREE under arrest.

b. Victim-1 later provided a sworn statement to a YPD detective. In that sworn statement, Victim-1 reported, in substance and in part, that SABREE is the father of her grandchild; that she went to Residence-1 on the morning of June 25 to pick up her grandchild; that after she arrived at Residence-1, SABREE pulled a small silver handgun out of his pocket and pointed it at her; and that SABREE then reentered Residence-1.

c. On or about June 25, 2022, at approximately 3:42 p.m., YPD searched Residence-1 pursuant to a state search warrant (the "Search Warrant")¹ and recovered a small silver handgun (the "Firearm") from a bedroom. The Firearm was determined to be a Rossi .357 revolver, S/N F090464, loaded with six live rounds.

d. SABREE was transported to the YPD Detective Division upon arrest. SABREE was read his Miranda rights and agreed to speak with law enforcement. SABREE initially said that he had only pointed a knife at Victim-1 and that he did not have

¹ The affidavit in support of the Search Warrant states that after SABREE was placed under arrest, YPD officers entered Residence-1 to retrieve belongings for Victim-1's grandchild. When inside Residence-1, a YPD officer saw a box of ammunition labeled "RUGER" in a bedroom and a holster on the couch in the living room.


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a gun, but eventually admitted, in sum and substance, that he had lied about not having a gun. SABREE then said, in sum and substance, that he would continue to speak with law enforcement with a lawyer present. The YPD detectives stopped the interview, but SABREE then began to volunteer additional information. Several hours later, I read SABREE his Miranda rights again, and SABREE agreed to speak with me and a task force officer. In response to our questions, SABREE admitted, in substance and in part, that he had pointed a gun at Victim-1's boyfriend and that the Firearm found in Residence-1 belonged to him.

4. Based on my participation in this investigation, my conversations with other law enforcement officers, and my review of reports and records, I am aware that photographs of the Firearm were submitted to a trained examiner from the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"). The ATF examiner concluded that the Firearm was manufactured outside of New York State.


5. I have reviewed criminal history records pertaining to ALI SABREE, the defendant, which show that SABREE was convicted on or about March 13, 2017, in Westchester County Court, of criminal possession of a firearm, in violation of New York Penal Law § 265.03(3), a felony, and was sentenced on or about January 10, 2018, to a term of 42 months' imprisonment.

WHEREFORE, deponent respectfully requests that ALI SABREE, the defendant, be arrested, and imprisoned or bailed, as the case may be.



KARMA SMITH
Special Agent
Federal Bureau of Investigation

Sworn to me this 27 day of June, 2022



THE HONORABLE JUDITH C. MCCARTHY
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK